REMARKS/ARGUMENTS

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith, which place the application into condition for allowance. The present amendment is being made to facilitate prosecution of the application.

I.   STATUS OF THE CLAIMS AND FORMAL MATTERS

Claims 18-31, which are hereby added, are pending in this application. Claim 18 is independent. Claims 1-17 have been canceled without prejudice or disclaimer of subject matter. Support for these amendments is provided in the specification. No new matter has been introduced. It is submitted that these claims, as originally presented, were in full compliance with the requirements of 35 U.S.C. §112. Changes to claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

Claims 4-13 and 17, which were objected to, are hereby canceled, thereby obviating the objection.

II.   REJECTIONS UNDER 35 U.S.C. §102 and §103(a)

Claims 1, 2, and 14-16 were rejected under 35 U.S.C. §102 as allegedly anticipated by U.S. Patent No. 6,285,989 to Shohan. (hereinafter, merely "Shohan")

Claim 3 was rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Shohan in view of U.S. Patent No. 6,341,267 to Taub. (hereinafter, merely "Taub")

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Applicants submit that the new claims are directed to a system for supporting a communication to operate a trading center.

As understood by Applicants, Shohan discloses an universal on-line trading market design and deployment system. According to figure I of Shohan a trading system comprises a Market-Specification Console (MSC) 110 which allows according to column 5, lines 20 to 28, a "market designer" to specify respective market protocols to upload them onto a Programmable Auction Server (PAS) 140 for execution. According to column 6, line 52, to column 8, line 46, to generate a respective market protocol respective Trading Primitives (TPs) listed in table 2 can be used by the market designer. According to column 5, lines 29 to 35, a Programmable Auction Server (PAS) 140 is used to execute the protocols defined by the market designer and especially to open auctions, to accept bids, to clear prices, to notify traders of market events, and to close auctions. A trader can influence the auction by an Universal Trading Console (UTC) 120. According to column 5, lines 36 to 42, and column 12, lines 51 to 54, of Shohan, a trader, that means, according to column 14, lines 4 to 5, a seller or bidder, can participate in the trading by submitting or confirming a bid or requesting information related to traders or goods. Thus to participate in the trading a trader communicates via the UTC 120 through an internet connection 160 with the PAS 140. Especially according to figure 5 and column 12, lines 38 to 65, each specific market related action or query is communicated separately through the communication line.

The trading market design known from Shohan has the disadvantage that only a special trained "market designer" may adapt the trading market to the special needs for a respective trading, especially auction. According to column 8, line 59, to column 9; line 8, a market designer has to use a special scripting language to program the PSA 140 via the MSC

110. According to column 7, lines 1 to 3, the market designer is especially a person different 3

from a "seller", "buyer", "auctioneer", "dealer", "specialist", "settlement agencies" or

"accreditation body". Thus the drawback of the design disclosed in Shohan is that the respective

trading scenarios have to be predefined by a market designer.

        An advantage of the present invention is to develop the generic system for

supporting a communication to operate a trading center known from Shohan, such that the

drawbacks known from the state of the art are overcome. A system for supporting a

communication to operate a trading center is provided that enables an initiator, such as a seller,

to establish an electronic trading based on a variety of trading scenarios and that simultaneously

enables a further operation of the trading center, especially in the case an initiator of a trading

may chose the respective information also in case the initiator is offline.

        Claim 18 recites:

> "…at least one first workstation on a side of an operator; and
>
> a plurality of second workstations with access to the internet on a side of an initiator,
>
> wherein at the first workstation, a matrix with at least four dimensions can be generated and can be transmitted from there,
>
> wherein each dimension includes at least one selection list,
>
> the selection list comprising:
>
> at least a first initiator list,
>
> a second market segment list,
>
> a third product list, and
>
> a fourth trading scenario list, and
>
> wherein each selection list comprises a number of elements, which can be individually marked for selection or unselection,

> wherein each marking of one of the elements can preferably be stored and recalled,
>
> wherein the matrix can be called and processed at each of the second workstations, and
>
> wherein the process matrix can be sent from each of the second workstations, and
>
> wherein the sent and processed matrix can be processed at the first workstation." (emphasis added)

The claimed subject matter is based on the unique perception that by providing to a trader, in the sense of a seller, a four dimensional matrix the trader or initiator of the trading may adapt the trading center to his needs, especially to a respective trading scenario. The initiator does not need any special knowledge with regard to a programming or script language and the operator of the trading center does not have to predefine a respective trading scenario as the initiator has the ability to adapt on his own the trading center to his needs.

Furthermore, as the complete matrix is transferred from the first workstation to the second workstation of the initiator the initiator can use the respective elements of the matrix to adapt the trading center to his needs also in case temporarily no connection between the workstation of the initiator and the workstation of the operator is existing as described on page 7, last paragraph, to page 8, first paragraph, of the originally filed application documents. After the adaptation of the matrix, the matrix is sent back to the first workstation and processed there to implement the respective trading in the trading center. Thus, with the system according to the claimed subject matter a trader can adapt the trading center to his needs without the necessity that the operator of the trading center has to predefine a respective trading scenario and an initiator of the trading scenario may adapt the trading center to his needs although a connection to the operator is interrupted.

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Shohan does not teach or suggest that a trader may use a matrix to adapt a trading center to his needs but that an operator as a market designer has to adapt the trading center to all possible trading scenarios and needs of the respective traders programming a Market Specification Console (MSC) 110. Such disclosure does not render claim 1 unpatentable.

As understood by Applicants, Taub is directed to a method, system and apparatus for matching individuals with behavioral requirements and for managing providers of services to evaluate or increase individual's behavioral capabilities. As the method, system and apparatus is used according to column 1, lines 12 to 16, of Taub, for education, training, therapy and medical services purposes and according to column 5, lines 29 to 33, data is obtained by analyzing individual brain waves.

Applicants submit that the subject matter of Taub is far away from the claimed subject matter of above claimed trading system.

Furthermore Taub does not teach or suggest the disclosure missing in Shohan. Specifically, Taub does not teach or suggest a system for supporting a communication to operate a trading center as recited above.

Applicants submit that nothing has been found in Shohan or Taub, taken alone or in combination, that would teach or suggest the above identified features of claim 18.

Specifically there is no teaching or suggestion of at least one first workstation on a side of an operator and a plurality of second workstations with access to the internet on a side of an initiator, wherein at the first workstation, a matrix with at least four dimensions can be generated and can be transmitted from there, wherein each dimension includes at least one selection list, the selection list comprising at least a first initiator list, a second market segment list, a third product list, and a fourth trading scenario list, and wherein each selection list

comprises a number of elements, which can be individually marked for selection or unselection,
wherein each marking of one of the elements can preferably be stored and recalled, wherein the
matrix can be called and processed at each of the second workstations, and wherein the process
matrix can be sent from each of the second workstations, and wherein the sent and processed
matrix can be processed at the first workstation, as recited in independent claim 18.

Therefore, Applicants submit that independent claim 18 is patentable.

III.   DEPENDENT CLAIMS

The other claims in this application are each dependent on an independent claim
discussed above, and are therefore believed patentable for at least the same reasons. Since each
dependent claim is also deemed to define an additional aspect of the invention, however, the
individual reconsideration of the patentability of each on its own merits is respectfully requested.


CONCLUSION

In the event the Examiner disagrees with any of statements appearing above with
respect to the disclosures in the cited reference, or references, it is respectfully requested that the
Examiner specifically indicate those portions of the reference, or references, providing the basis
for a contrary view.

Please charge any additional fees that may be needed, and credit any
overpayment, to our Deposit Account No. 50-0320.

In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Respectfully submitted,
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